

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
INTEGRA MED ANALYTICS LLC,

Plaintiff,

v.

CREATIVE SOLUTIONS IN
HEALTHCARE, INC.,

Defendant.

Civil Action No. SA-17-CV-1249-XR

JOINT STATEMENT ON THE STATUS OF PHASE I DISCOVERY

On June 21, 2021, the Court held a status conference regarding discovery in the case, which at the time was stayed because of the COVID-19 pandemic. At the hearing, the Court held that discovery will be conducted in phases, and that Phase I document discovery should include communications and documents (i) between and amongst Defendant's corporate employees, (ii) between and amongst Defendant's corporate employees and two relevant rehabilitation contractors, and (iii) between and amongst Defendant's corporate employees and employees at a subset of the facilities at issue in the complaint. On September 8, 2021, the Court re-opened the case and ordered this Joint Statement "advising the Court of a proposed deadline for the completion of Phase I discovery." Dkt. #95. On September 20, 2021, in response to the parties' joint statement, the Court ordered the parties to submit a joint statement on the status of Phase I discovery. The parties hereby state as follows.

Since the parties' last update, Defendant has produced a seed production that the parties are using to craft the list of facilities, custodians, and search terms to be applied in Phase I of

discovery. The parties have agreed that, with regard to the third category of documents described above, document discovery will be limited to custodians at either six or seven facilities.

Relator is presently concluding its review of the seed production, and Defendant is presently working on the production of a supplemental organizational chart to help with the selection of facilities, custodians, and search terms. The parties hope to have made substantial progress on all fronts in the next six weeks, and thus request that the court set a deadline on or around January 5, 2022, for the next Joint Statement on Phase I Discovery that should include any unresolved discovery disputes.

Date: November 19, 2021

/s/ Jeremy H. Wells

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of November 2021, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants for this matter.

/s/ Jeremy H. Wells

Jeremy H. Wells